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GOLDEN COLORADO 80402 0928

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Department of Energy

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**ACTION** 

ECAC ROCKY FLATS PLANT CORRESPONDENCE CONTROL

94-DOE-12635

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Mr Joe Schieffelin, Unit Leader Hazardous Waste Facilities Colorado Department of Public Health and the Environment 4300 Cherry Creek Drive South Denver, Colorado 80222-1530

## Gentlemen

On Monday, November 21, 1994, the Department of Energy (DOE) presented a request to the Environmental Protection Agency (EPA) and the Colorado Department of Public Health and Environment (CDPHE) to decouple the Ecological Risk Assessment (ERA) section from the operable unit (OU) No 5 and 6 draft RCRA Facility Investigation/Remedial Investigation (RFI/RI) reports At that meeting, all parties agreed that rather than decoupling the ERA, the DOE would pursue a milestone extension request so that the ERA could be included in the OU 5 and 6 RFI/RI reports

This request to extend OU 5 and 6 RFI/RI schedules stems from the new scope required to adopt a watershed approach to generating ERAs. Review of the ERA portion of the OU 1 RFI/RI Report revealed that the present scope of the OU-based ERAs would not be acceptable to EPA and CDPHE for subsequent ERAs. To this end, the DOE, in concert with EPA and CDPHE, created an ERA methodology based on a watershed approach as described in current ERA practice and EPA guidance. These watershed ERAs will be commonly rooted in three site-wide technical memoranda (TM) which describe the ERA approach. These TMs include the ERA conceptual model, assessment endpoints, and ecological contaminants of concern. Approximately three months must be added to the OU 5 and 6 RI/RFI schedules to accommodate completion of these TMs. The new scope described by moving from the OU-specific ERAs to the new site-wide TMs and attendant watershed ERAs is the primary justification for the OU 5 and 6 RFI/RI date extensions requested below.

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Reviewed for Addressee Corres Control RFP

12-19-94 RDA

Ref Ltr #

DOE ORDER # 5400:1

The OU 5 and 6 schedules have been revised since the November 21, 1994, meeting The resulting Draft RFI/RI Report delivery dates are extended three months The proposed extension for Final RFI/RI reports is two months

Two factors necessitate request for extension beyond the six weeks discussed in the November 21 meeting First, six weeks are necessary for incorporation of the ERA into

the baseline risk assessment and the Draft RFI/RI Report. Second, three weeks are added by appropriating 20 days for EPA and CDPHE review of each site-wide ERA TM

The proposed Interagency Agreement Table VI milestone dates are

OU 5

Draft RFI/RI Report November 1, 1995 Final RFI/RI Report April 2, 1996

OU<sub>6</sub>

Draft RFI/RI Report October 2, 1995 Final RFI/RI Report February 21, 1996

The following table provides approximate external deliverable dates for ERA site-wide TMs and OU-specific ERA TMs. This information is provided to give EPA and CDPHE an opportunity to anticipate and plan for reviews.

Draft Site-Wide ERA Assessment Endpoint TM
Draft Site-Wide Conceptual Model TM
Draft Site-Wide Ecological COC Screen Method
OU 5 Draft Problem Formulation TM
OU 6 Draft Problem Formulation TM
Draft Site-Wide ERA Assessment Endpoint TM
January 16, 1995
January 16, 1995
April 12, 1995
March 13, 1995

Several meetings will be convened with the EPA and CDPHE at regular intervals to review status and gain EPA and CDPHE input on the TMs

If you have any questions or concerns, please call Kurt Muenchow at 966-2184

Sincerely,

IAG Project Coordinator

Environmental Restoration

CC

B Lavelle, EPA

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B Miller, EPA

C Spreng, CDPHE

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